

4. The only proper purpose for which a jury may consider evidence of AstraZeneca's profits and revenues is determining punitive damages where permissible and punitive damage issues are not part of this trial.

WHEREFORE Defendant AstraZeneca respectfully requests that this Court enter an Order excluding evidence regarding AstraZeneca's profits and revenues and grant all other relief that this Court deems just and appropriate.

Respectfully submitted,

By: /s/ Katherine B. Schmeckpeper

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Dated: March 23, 2007

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I certify that counsel for AstraZeneca Pharmaceuticals LP conferred with counsel for Plaintiffs pursuant to L.R. 7.1 prior to filing this motion and Plaintiffs did not consent to the motion.

/s/ Katherine B. Schmeckpeper
Katherine B. Schmeckpeper

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered on March 23, 2007 to counsel for plaintiffs and to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, via LexisNexis File & Serve.

By: /s/ Katherine B. Schmeckpeper
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